

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SCRAMOGE TECHNOLOGY LTD.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 6:21-cv-00616-ADA

JURY TRIAL DEMANDED

[REDACTED]

REDACTED DOCUMENT

**DECLARATION OF ANDREW ROPE IN SUPPORT OF DEFENDANT GOOGLE
LLC'S MOTION TO TRANSFER VENUE TO THE NORTHERN DISTRICT OF
CALIFORNIA UNDER 28 U.S.C. § 1404(a)**

I, Andrew Rope, declare and state as follows:

1. I am a Senior Legal Project Manager on the Discovery Legal team at Google LLC ("Google"). I have been a Google employee since 2018. My office is in Mountain View, California.

2. I provide this declaration in support of Google's Motion to Transfer Venue To The Northern District of California Under 28 U.S.C. § 1404(a), which seeks to transfer the above-captioned action filed by Scramoge Technology Limited ("Scramoge") on June 15, 2021. I am over 18 years of age and have personal knowledge of the facts in this Declaration. If called as a witness, I could and would testify competently to the information contained herein.

3. Google's Mountain View headquarters, which includes offices in neighboring Sunnyvale (collectively referred to as "Mountain View"), is the strategic center of Google's business. On June 15, 2021, the Mountain View headquarters employed approximately [REDACTED]

employees, which is approximately [REDACTED] % of Google's U.S. employees. On June 15, 2021, Google also had approximately [REDACTED] other employees in offices in San Francisco, California and other smaller offices also within the Northern District of California (the "N.D. Cal."). On June 15, 2021, approximately [REDACTED] % of Google's [REDACTED] total U.S. employees, including engineers, product managers, marketers, executives, and staff were employed out of Google's offices located in the N.D. Cal.

4. I understand that Scramoge has accused certain Google Pixel series smartphones ("Pixel Products") that utilize a particular wireless charging component.

5. Based on my knowledge and investigation, the Google employees who have knowledge about the technical, financial, and marketing aspects of the accused Pixel Products are based in the San Francisco Bay Area. In particular, the engineers and groups with knowledge relating to the accused wireless charging components are based in or near Mountain View, California. Google's design, development, testing, and implementation of the accused wireless charging components in the Pixel Products all occur in Mountain View, California.

6. Based on my knowledge and investigation, Google sources the accused wireless charging components from three suppliers that build the wireless charging components to Google's specifications: [REDACTED] All three suppliers have program management and sales people in their respective California offices that Google interfaces directly with in the design, development, and testing of the accused wireless charging components.

7. Based on my knowledge and investigation, [REDACTED] is a hardware engineer working at Google. I understand Mr. Polu is based in the San Francisco Bay Area and works at

Google's Mountain View headquarters. I understand that [REDACTED] has knowledge regarding the design, development, testing, and implementation of the accused wireless charging component.

8. Based on my knowledge and investigation, [REDACTED] is a hardware engineer working at Google. I understand [REDACTED] is based in the San Francisco Bay Area and works at Google's Mountain View headquarters. I understand that [REDACTED] has knowledge regarding the design, development, testing, and implementation of the accused wireless charging component.

9. Based on my knowledge and investigation, [REDACTED] is a hardware engineer working at Google. I understand that [REDACTED] is based in the San Francisco Bay Area and works at Google's Mountain View headquarters. I understand that [REDACTED] has knowledge regarding the technical aspects of the accused Pixel Products, including their implementation of the accused wireless charging component. [REDACTED] also has knowledge regarding the design, development, testing, and implementation of the accused wireless charging component.

10. Based on my knowledge and investigation, [REDACTED] is a software engineer working at Google. I understand [REDACTED] is based in the San Francisco Bay Area and works at Google's Mountain View headquarters. I understand that [REDACTED] has knowledge regarding the technical aspects of the accused Pixel Products, including their implementation of the accused wireless charging component. [REDACTED] also has knowledge regarding the testing and implementation of the accused wireless charging component.

11. Based on my knowledge and investigation, [REDACTED] is a global sourcing and supply manager working at Google. I understand that [REDACTED] is based in the San Francisco Bay Area and works at Google's Mountain View headquarters. I understand that [REDACTED] has knowledge regarding Google's business relationship with suppliers of the accused wireless charging component for the accused Pixel Products.

12. Based on my knowledge and investigation, [REDACTED] is a global sourcing and supply manager working at Google. I understand that [REDACTED] is based in the San Francisco Bay Area and works at Google's Mountain View headquarters. I understand that [REDACTED] has knowledge regarding Google's business relationship with suppliers of the accused wireless charging component for the accused Pixel Products.

13. Based on my knowledge and investigation, the marketing efforts for the accused Pixel Products are also managed by employees located at Google's Mountain View headquarters.

14. Based on my knowledge and investigation, [REDACTED] is Google's Head of Product Marketing for Pixel Products. I understand that [REDACTED] is based in the San Francisco Bay Area and works at Google's Mountain View headquarters. I understand that [REDACTED] has knowledge regarding Google's marketing, promotion, and business information for the accused Pixel Products.

15. Based on my knowledge and investigation, [REDACTED] is a senior financial analyst in the Pixel business unit working at Google. I understand that [REDACTED] is based in the San Francisco Bay Area and works at Google's Mountain View headquarters. I understand that [REDACTED] has knowledge regarding Google's financial data and statements, accounting, and record-keeping related to the accused Pixel Products.

16. Based on my knowledge and investigation, [REDACTED] is a patent counsel working at Google. I understand that [REDACTED] is based in the San Francisco Bay Area and works at Google's Mountain View headquarters. I understand that [REDACTED] has knowledge regarding Google's license agreements and licensing practices.

17. Based on my knowledge and investigation, I am not aware of any Google employees with relevant technical, marketing, or financial knowledge regarding the accused Pixel

Products who are based in the Western District of Texas, including in Google's offices in Austin, or anywhere else in Texas.

18. As a matter of Google practice, documents and physical evidence in Google's possession about its products and services are normally created and maintained by the employees working on those products and services. As discussed above, the employees with the most relevant knowledge of the accused features of the Pixel Products are located primarily in or around Mountain View, California, and no such employees are in the Western District of Texas. [REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury that to the best of my knowledge the foregoing is true and correct. Executed on September 17, 2021, in Aptos, California.

DocuSigned by:
Andrew Rope
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Andrew Rope